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EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

November 17, 2023

Via ECF

Hon. Valerie Figueredo
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States ex rel. Bassan v. Omnicare, Inc.*, No. 15 Civ. 4179 (CM) (VF)

Dear Judge Figueredo:

Under Your Honor's Individual Practices Rule I.g, and the Protective Order in this action, we write to request the Court's permission to file conditionally under seal an unredacted version of the opposition to the government's motion to modify the scheduling order (ECF 385), as well as excerpts from two deposition transcripts cited in the filing. Although Defendants do not believe that any portion of the letter or deposition excerpts should be kept confidential, the depositions were taken recently and the Protective Order requires Defendants to treat them as presumptively confidential at this time.

We appreciate the Court's consideration.

Sincerely,

/s/ David Randall J. Riskin

David Randall J. Riskin

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: November 20, 2023

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 393.